

MEMO ENDORSED

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September 27, 2021

VIA ECF & EMAIL

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *U.S. v. Jonathan Delaura*
12 Cr. 812 (KMK)**

Dear Judge Karas:

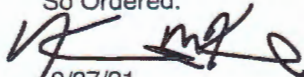
I was assigned by the Court on June 1, 2021, as independent counsel to advise Mr. Delaura of the ramifications if the Court granted his § 2255 petition on consent. The Court ordered that counsel provide a status update in 30 days. I have met with Mr. Delaura a number of times and have spoken to the Government and defense counsel. A Protective Order was signed by counsel and Mr. Freifeld and filed with the Court on August 24, 2021. Additionally, I have reviewed Rule 16 discovery produced by the Government in a letter dated August 27, 2021. On September 13, 2021, I reviewed some of the evidence relating to the charges that Mr. Delaura pled guilty to at the Putnam County Sheriff's Office in Carmel, New York. Further, on Saturday, September 25, 2021, I had scheduled a meeting with Mr. Delaura at the MDC to review the discovery with him and discuss his options. After waiting for Mr. Delaura to be escorted to the attorney visiting area, I was informed that Mr. Delaura had been placed in a quarantine unit the day before and therefore, could have no visits for the next 14 days. Accordingly, counsel respectfully requests an additional 45 days to permit time for Mr. Delaura to finish quarantine and to meet with him regarding the case. The Court's time and attention to this matter is greatly appreciated.

Granted. Very disappointing that Ms. Shelley's time
was wasted at the MDC.

Respectfully submitted,

/s/

So Ordered.


9/27/21

Margaret M. Shalley

cc: AUSA Marcia Cohen
Andrew Freifeld (*via ECF & email*)